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Attorneys for Defendants  
TEACHERS HEALTH TRUST AND MICHAEL STEINBRINK

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

DIANA GOODSELL, individually and on  
behalf of all those similarly situated; et al;

Plaintiffs,

v.

TEACHERS HEALTH TRUST, *et al.*

Defendants.

CASE NO.: 2:23-cv-01510-APG-DJA

Removed from State Court  
Case No. A-18-774418-B

**JOINT MOTION TO EXTEND  
DEFENDANT MICHAEL  
STEINBRINK'S RESPONSE DEADLINE  
TO THE SECOND AMENDED  
COMPLAINT**

[Proposed] Order Filed Concurrently

1 Plaintiffs named and unnamed (collectively “Plaintiffs”) and Defendant Michael  
2 Steinbrink, through their respective counsel of record, states as follow:

3 1. This case was removed from the Eighth Judicial District Court, Clark County,  
4 Nevada on September 25, 2023 (ECF 1) and on October 3, 2023, the Davita Defendants filed an  
5 emergency motion to stay. (ECF 19).  
6

7 2. On November 1, 2023, the Court granted the motion to stay the case, “for all  
8 purposes except resolution of the pending motions to compel and dismiss.” (ECF 47).

9 3. On December 12, 2023, the Court lifted the stay. (ECF 62).

10 4. Pursuant to Federal Rule of Civil Procedure 15, Mr. Steinbrink’s responsive  
11 deadline is currently December 26, 2023.  
12

13 5. On December 21, 2023 counsel for Mr. Steinbrink and counsel for Plaintiffs  
14 agreed to extend the responsive pleading deadline by 21 days to January 16, 2024 in light of the  
15 holidays.

16 6. This is the first stipulation for extension of time for Mr. Steinbrink to respond to  
17 the Second Amended Complaint and is filed in accordance with Local Rule 7-1.  
18

19 [SIGNATURE PAGE FOLLOWS]  
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22  
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24  
25  
26  
27  
28

1  
2 Dated: December 27, 2023

HARTWELL THALACKER, LTD.  
/s/Doreen Spears Hartwell  
Doreen Spears Hartwell, Esq.  
Nevada Bar. No. 7525  
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5  
6 and

7 Charles E. Weir (admitted pro hac vice)  
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13 Chicago, IL 60606

14 *Attorneys for Defendants Teachers Health*  
15 *Trust And Michael Steinbrink*

16 Dated: December 27, 2023

HAYES WAKAYAMA JUAN

17 /s/ Jack C. Juan  
18 Jack C. Juan  
19 5798 S. Durango Drive  
Suite 105  
20 Las Vegas, NV 89113

21 Gene J. Stonebarger  
STONEBARGER LAW, APC  
101 Parkshore Drive, Suite 100  
22 Folsom, California 95630

23 **IT IS SO ORDERED.**

24 DATED: 1/4/2024

*Attorneys for Plaintiffs*

25   
26 DANIEL J. ALBRECHTS  
27 UNITED STATES MAGISTRATE JUDGE  
28

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on this 27th day of December, 2023.

/s/Doreen Spears Hartwell

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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behalf of all those similarly situated; et al;

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CASE NO.: 2:23-cv-01510-APG-DJA

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**[PROPOSED] ORDER GRANTING  
JOINT MOTION TO EXTEND  
DEFENDANT MICHAEL  
STEINBRINK'S RESPONSE DEADLINE  
TO THE SECOND AMENDED  
COMPLAINT**

**IT IS SO ORDERED:**

The Court, having read and considered the Joint Motion for Extension of Defendant Michael Steinbrink's Response to Plaintiffs' Second Amended Complaint, ORDERS the deadline continued to January 16, 2024.

DATED: \_\_\_\_\_, 2023

\_\_\_\_\_  
UNITED STATES DISTRICT COURT JUDGE  
Hon. Andrew P. Gordon